

1 JASON M. FRIERSON
United States Attorney
2 Nevada Bar No. 7709
District of Nevada
3 EDWARD G. VERONDA
Assistant United States Attorney
4 501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
5 Tel: (702) 388-6336
Fax: (702) 388-6418
6 Edward.G.Veronda@usdoj.gov
Attorneys for the United States of America
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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 SHEENA ELKIND,

14 Defendant.
15

Case No. 2:20-mj-00709-BNW

**Stipulation to Continue the Preliminary
Examination Date and Exclude Time Under
the Speedy Trial Act
(Thirteenth Request)**

16 IT IS HEREBY STIPULATED AND AGREED by and between, JASON M.
17 FRIERSON, United States Attorney, District of Nevada, Edward G. Veronda, Assistant United
18 States Attorney, representing the United States of America, and Gabriel Grasso, Esq.,
19 representing Defendant Elkind, that the Preliminary Examination date in the above captioned
20 case, which is currently scheduled for August 2, 2022 at 1:30 P.M., be continued to a date and
21 time convenient for the Court, but not less than 90 days from the current setting. The parties also
22 stipulate to an extension of the 90-day period under 18 U.S.C. § 3161(b) in which an indictment
23 or information must be returned.
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1. This continuance is not sought for purposes of delay. The parties continue investigation, meet together and are actively working on a resolution of the case without an Indictment.
2. Defense counsel needs additional time to review available discovery and meet and confer with the defendant to discuss possible resolutions or strategies.
3. With the Court's and U.S. Probation's permission, Elkind intends to travel outside the jurisdiction related to matters regarding the death of her father for a period of time.
4. Denial of this request could result in a miscarriage of justice, and the ends of justice served by granting this request outweigh the best interests of the public and the defendant in a speedy trial.
5. The defendant is at liberty and does not object to the continuance.
6. This is the parties' thirteenth request to continue the Preliminary Examination date.
7. The additional time requested by this stipulation is excludable in computing the time within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(7)(A), and considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i) and (iv).

DATED this 26th day of July, 2022

JASON M. FRIERSON
United States Attorney

/s/ Edward G. Veronda
EDWARD G. VERONDA
Assistant United States Attorney

/s/ Gabriel Grasso
GABRIEL GRASSO, Esq.
Counsel for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,) Case No. 2:20-mj-00709-BNW
)
Plaintiff,) **Findings and Order on Stipulation**
)
v.)
)
SHEENA ELKIND,)
)
Defendant.)
)

Based on the pending Stipulation between the defense and the government, and good cause appearing therefore, the Court hereby finds that:

1. This continuance is not sought for purposes of delay. The parties continue investigation, meet together and are actively working on a resolution of the case without an Indictment.
2. Defense counsel needs additional time to review available discovery and meet and confer with the defendant to discuss possible resolutions or strategies.
3. The parties agree to this continuance.
4. With the Court's permission, Elkind intends to travel outside the jurisdiction related to the death of her father for a period of time.
5. The defendant is at liberty and does not object to the continuance.
6. This continuance is not sought for purposes of delay.
7. Denial of this request could result in a miscarriage of justice, and the ends of justice served by granting this request outweigh the best interest of the public and the defendants in a speedy trial.

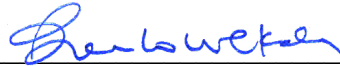
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1 8. The Speedy Trial Act's indictment clock under 18 U.S.C. § 3161(b) is extended to the
2 Preliminary Hearing date set below.

3 9. The additional time requested by this stipulation is excludable in computing the time
4 within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United
5 States Code, Sections 3161(h)(7)(A), and considering the factors under Title 18, United
6 States Code, Section 3161(h)(7)(B)(i) and (iv).

7 THEREFORE, IT IS HEREBY ORDERED that the Preliminary Examination in the
8 above-captioned matter currently scheduled for August 2, 2022 be vacated and continued to
9 November 3, 2022 at 2:00 p.m.

10 DATED: July 28, 2022.

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13 HONORABLE BRENDA N. WEKSLER
14 UNITED STATES MAGISTRATE JUDGE
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